



*South Carolina*  
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June 11, 2021

**VIA ELECTRONIC FILING**

The Honorable Jocelyn Boyd  
Chief Clerk/Executive Director  
The Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

RE: Docket 2021-183-E  
Application of Lockhart Power Company for Authority to Adjust and Increase Its Electric Rates and Charges  
**Department of Consumer Affairs Comments on Proposed Customer Bill Insert Timeline**

Dear Ms. Boyd:

The Department of Consumer Affairs (the "Department") submits this letter in response to the Commission's June 9, 2021 "Proposed Customer Bill Insert Timeline". As Lockhart Power Company ("Lockhart") has indicated, it may not file its application on June 28, 2021; therefore the proposed timeline may need to be revised. The Department is willing to work with Lockhart, and any other parties, to propose a schedule acceptable to the parties and the Commission.

In the event the parties do not agree on a schedule, and for the Commission's future consideration, the Department offers the following comments on the currently proposed timeline. The timeline provides 71 days from the date of filing the application for Lockhart Power Company ("Lockhart") to file its direct testimony. Under the proposed timeline, all other parties' direct testimonies would be due two weeks after Lockhart's. Rebuttal testimony is due two weeks after that and surrebuttal two weeks after rebuttal.

The Department requests the Commission allow at least four weeks from the date Lockhart files its direct testimony for other parties to file their direct testimonies. This could be

accomplished, without changing any other proposed dates or timeframes, by moving up the due date for Lockhart's direct testimony by two weeks. This would still provide Lockhart nearly two months to prepare its testimony. The primary purpose of direct testimony should be to support the company's application. Utilities have months to prepare their applications for filing; therefore, companies should have testimony already prepared (or close to being finalized) at the time of filing an application.

The Department submitted similar comments in Docket No. 2020-247-A regarding the Commission's practice and procedure regulations. In those comments, we noted, pursuant to S.C. Code Ann. 58-5-240(C), the Commission must issue an order within six months after the filing of an application for an adjustment of rates. Due to that limited timeframe and the disadvantage it creates for intervening parties, we suggested companies be required to submit direct testimony at the time of filing applications for rate cases. While that may not be feasible currently, we believe providing Lockhart nearly two months to prepare its direct testimony is more than adequate. As noted in our prior comments, doing so will provide additional time for intervenors to review the company's application and testimony, and prepare discovery relevant to those filings, before submitting their own direct testimony. It would also lead to more thorough, informed hearings and final orders.

We appreciate the Commission's consideration of these comments.

Regards,

A handwritten signature in blue ink, appearing to read "Roger Hall".

Roger Hall, Esq.  
*Deputy Consumer Advocate*